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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

March 11, 1996

EL-2

Dennis W. Martin
Forest Supervisor
Inyo National Forest
873 North Main Street
Bishop, CA. 93514-2494

Dear Mr. Martin:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement for the project entitled **Proposed Snowcreek Golf Course Expansion Project, Inyo National Forest, California**. Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

Dempsey Construction has applied for a special use permit from the Inyo National Forest to accommodate expansion of the Snowcreek Golf Course. The proposed site occupies approximately 95 acres of National Forest system lands and is located adjacent to the existing 9-hole golf course on private lands (Snowcreek Resort) on the boundary of the Town of Mammoth Lakes. The proposal includes construction and maintenance of clubhouse facilities, parking areas, practice range, playing areas, water hazards, and irrigation systems. The purpose of the project is to enhance the summer recreation opportunities available to the public in the Town of Mammoth Lakes which is a year-round destination resort community dependent on the ski industry and summer recreational activity.

Five alternatives were considered in detail. Alternative A is the proponent's proposal to expand the golf course on 95 acres of National Forest land. Irrigation water would be supplied from a mix of reclaimed water and pumped ground water. Alternative B, the Forest Service's Preferred Alternative, is a modified version of Alternative A, with relocation of the parking area and practice field. Irrigation water would be supplied by reclaimed water. Alternative C would develop the golf course on private lands, currently planned for residential and commercial land uses, within the Snowcreek Resort. Alternative D would exchange the proposed development site on National Forest lands for suitable private land, and Alternative E is the No Action alternative.

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We commend the Forest Service for their efforts to reconcile the proponent's proposal with resource constraints. Of special note is the use of reclaimed water for irrigation, accommodation of the existing use of the area by deer, and minimization of visual impacts. We agree that the proposed golf course may serve to meet the needs of the community while providing wildlife habitat (e.g., ponds, riparian zones) and a buffer zone adjacent to Forest Service lands. Nonetheless, we continue to have concerns regarding the need for the expanded golf course, water quality and quantity, and potential impacts to wildlife habitat; especially in light of the cumulative impacts anticipated from multiple development projects in the area.

It is our understanding that the Forest Service is also considering approval of the Master Development Plan by Dempsey Construction for the Sherwin/Snowcreek Ski Area (pg. I-5) which overlaps the southern portion of the proposed golf course expansion. The ski area proposal and golf course expansion appear to be linked and part of the same Snowcreek Resort Master Plan. As linked components of the same Master Plan, we believe a combined environmental evaluation of these two projects may have more effectively fulfilled the intent of NEPA to help public officials make decisions that are based on understanding of all the environmental consequences. Thus, we recommend the Forest Service consider combining these projects and their decision actions into one environmental document. At a minimum, a detailed description of the Snowcreek Resort Master Plan and the relationship between the golf course expansion and ski area proposal should be included in the environmental documentation for both projects. We also recommend the Forest Service explain the rationale for separating these two actions and their determination of the scope for each project.

Because of the above concerns, EPA has classified this DEIS as category EC-2, Environmental Concerns - Insufficient Information (see attached "Summary of the EPA Rating System"). Our detailed comments are enclosed.

We appreciate the opportunity to review this DEIS. Please send one copy of the FEIS to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please call me at (415) 744-1584, or Laura Fujii, of my staff, at (415) 744-1579.

Sincerely,



David F. Farrel, Chief
Office of Federal Activities

Attachments: (3 pages)

MI002486

filename: snowcree.dei

cc: Robert H. Hawkins, Recreation Planner, Inyo NF
Mammoth Ranger District, Inyo NF
USFWS, Sacramento, CA.
CDFG, Bishop, CA.
Mammoth County Water District
Town of Mammoth Lakes, Planning Dept.

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommend for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1-Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

COMMENTS

Purpose and Need

We recognize and support the need for the Town of Mammoth Lakes to develop summer recreational opportunities to reduce the dependence on winter sports and create economic stability. However, the DEIS does not provide a convincing case for the demand or need for the expanded golf course; especially considering the presence of the Bishop golf course, newly approved Lodestar 18-hole golf course in the Town of Mammoth Lakes, and the two other proposed 18-hole golf courses in Mono County. Although, the DEIS states that conservative demand for golf play in the market may be approximately 116,000 rounds (pg. III-26), the already existing and proposed golf courses may already adequately provide for this demand. We recommend the project proponent and Forest Service carefully examine the demand for another golf course and evaluate whether there would truly be a net economic gain and an increase in summer recreational users. This evaluation should consider the tradeoffs between revenues and increased infrastructure costs, urban and dispersed recreation, and urban and wild land wildlife habitat.

Water Quality and Quantity

EPA strongly supports maximized use of reclaimed water. We are pleased that Alternative B emphasizes this use, and strongly recommend that reclaimed water use be maximized in the other alternatives.

Cumulative Impacts

The DEIS clearly states that there will be significant cumulative impacts from the proposed project when added to past, present and foreseeable future actions (pgs. IV-28 to IV-32). Substantial cumulative impacts to wildlife habitat, water quantity and quality, air quality, dispersed recreation, and visual quality arise from the continued development of the Town of Mammoth Lakes and construction of currently proposed recreational facilities (e.g., ski areas, golf courses) and residential/commercial developments. EPA has significant concerns with the potential adverse effects of these cumulative impacts; especially on water quality, the endangered Owens tui chub, wildlife habitat, and air quality.

While we have concerns, EPA firmly believes sustainable economic development and sound natural resource management are compatible and are, in fact, interdependent. Thus, if not already initiated, we urge the Forest Service, US Fish and Wildlife Service, project proponent, local community, industry,

and citizen groups to develop partnerships to address cumulative impacts, sustainable development, and coordinated resource management issues. The Coordinated Resource Management and Planning (CRMP) model or Natural Community Conservation Planning/Habitat Conservation Planning (NCCP/HCP) model, may be useful in the development of these partnerships and a coordination/collaborative process. These partnerships and coordination/collaborative process could provide an overarching mechanism for resolving development and resource conflicts and for developing mitigation measures for anticipated cumulative impacts. We strongly recommend proactive planning and development of mitigation measures for potential adverse cumulative impacts to environmental resources.

General Comments

A vicinity map displaying the locations of the Town of Mammoth Lakes, Snowcreek Resort, Snowcreek Golf Course and expansion, Snowcreek Ski Area, Lodestar Ski Area and golf course, Laurel Pond, Lake Mary, Mammoth Creek, and the major roads cited in the DEIS, would significantly improve understanding of the regional context of the proposed project.

Water Quality and Quantity

EPA strongly supports maximized use of recycled water. We are pleased that Alternative B emphasizes this use, and strongly recommend that recycled water use be maximized in the other alternatives.

Cumulative Impacts

The DEIS clearly states that there will be significant cumulative impacts from the proposed project when added to past, present and foreseeable future actions (pp. IV-28 to IV-32). Substantial cumulative impacts to wildlife habitat, water quantity and quality, air quality, dispersed recreation, and visual quality arise from the continued development of the Town of Mammoth Lakes and construction of currently proposed recreational facilities (e.g., ski areas, golf courses) and residential/commercial developments. EPA has significant concerns with the potential adverse effects of these cumulative impacts, especially on water quality, the endangered Owens cut snail, wildlife habitat, and air quality.

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